EXHIBIT "B"

Prothonotary > Case #2023-01782-CT > ACEY, ASSATA VS. INDUCTEV INCORPORATED et al

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Case Details

Case#: 2023-01782-CT Initial Date: 3/14/2023 Status: PENDING Case Type: EMPLOYMENT DISPUTE: DISCRIMINATION

Status Date: 3/14/2023

Judge: VERWEY,	ANTHONY T
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Date	D.	ocket	BI - b

3/14/2023 COMMENCEMENT OF ACTION FEE

:: :: On behalf of Plaintiff: ASSATA ACEY :: Filed By: ASSATA ACEY Receipt:

907506 Date: 03/15/2023

3/14/2023

:: :: On behalf of Plaintiff: ASSATA ACEY :: Filed By: ASSATA ACEY

3/14/2023

:: :: On behalf of Plaintiff: ASSATA ACEY :: Filed By: ASSATA ACEY

3/14/2023 **VERIFICATION**

:: :: On behalf of Plaintiff: ASSATA ACEY :: Filed By: ASSATA ACEY

3/14/2023 COVER SHEET(S) FILED

:: :: On behalf of Plaintiff: ASSATA ACEY :: Filed By: ASSATA ACEY

3/14/2023 REQUEST

:: :: On behalf of Plaintiff: ASSATA ACEY :: Filed By: ASSATA ACEY

3/15/2023 EFILING FEE Receipt: 907506 Date: 03/15/2023

3/23/2023

ORDER BY PER CURIUAM DATED MARCH 20, 2023 RE; UPON CONSIDERATION OF THE FOREGOING PETITION, IT IS HEREBY ORDERED THAT: A RULE ISSUED UPON THE RESPONDENT TO SHOW CAUSE WHY THE PETITIONER IS NOT ENTITLED TO THE RELIEF REQUESTED; THE RESPONDENT SHALL FILE AN ANSWER TO THE PETITION WITHIN TWENTY TWENTY (20) DAYS OF SERVICE UPON THE RESPONDENT: THE PETITION SHALL BE DECIDED UNDER PA.R.C.P. NO. 206.7: DEPOSITIONS SHALL BE COMPLETED WITHIN FORTY-FIVE (45) DAYS OF THE SERVICE UPON PETITIONER OF THE ANSWER TO THE PETITION; NOTICE OF THE ENTRY OF THIS ORDER SHALL BE PROVIDED TO ALL PARTIES BY THE PETITIONER.

(SEE ORDER FOR DETAILS)

COPIES SENT TO ALL COUNSEL AND UNREPRESENTED PARTIES ON

03/23/2023 SEE NEE FOR ECE NOTIFICATION

:: :: On behalf of : THE COURT :: Filed By: THE COURT

NOTIFICATION OF ELECTRONIC FILING 3/23/2023

CERTIFICATE OF SERVICE OF FOREGOING DOCUMENTS SERVED UPON 3/24/2023

DEFT VIA MAIL ON 03/23/23

3/28/2023 REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS BY PRO SE PLTF

3/28/2023 NOTICE - INTENT TO SERVE SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21 BY PRO SE PLTF

ASSATA ACEY

NOTICE - INTENT TO SERVE SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21 BY PRO SE PLTF 3/28/2023

3/28/2023 COPIES Receipt: 908434 Date: 03/28/2023

CERTIFICATION OF SERVICE OF FOREGOING DOCUMENTS SERVED UPON DEFT VIA MAIL ON 03/29/233/28/2023

SHERIFF SERVICE 4/6/2023

2023-01782-CT

COURT OF COMMON PLEAS OF CHESTER COUNTY—CIVIL ACTION
NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT
TO RULE 4009.21

I, Assata Acey, Plaintiff, intend to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

Date: 03/28/2023

Assata Acey (Pro Se)

2023-01782-CT

COURT OF COMMON PLEAS OF CHESTER COUNTY—CIVIL ACTION SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE 4009.22

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Judy Talis

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

1. Originals or photo copies of all possessed notes and presentations used by Judy Talis regarding InductEV's general employee diversity training.

at

5121 Brown St Philadelphia, PA, 19139

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Assata Acey (Pro Se) 5121 Brown St, Philadelphia, PA 19139 770-231-1017

BY THE COURT:

DATE:

By

2023-01782-CT

COURT OF COMMON PLEAS OF CHESTER COUNTY—CIVIL ACTION
NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT
TO RULE 4009.21

I, Assata Acey, Plaintiff, intend to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

Date: 03/28/2023

Assata Acev (Pro Se)

2023-01782-CT

COURT OF COMMON PLEAS OF CHESTER COUNTY—CIVIL ACTION SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE 4009.22

TO:

Ace American Insurance Co: Carmona Linda (aka Chubb)

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things:

- 1. Claims documents submitted by InductEV Incorporated for Chubb's regular business purpose (of approving or denying Defendant's liability insurance claim) relating to my charges against Defendant.
- 2. Claims Documents, submitted by Chubb investigators prior to approval of the claim(s) filed by InductEV Incorporated, used for Chubb's approval or denial of Defendant's insurance claim(s).
- 3. Claims history for InductEV Incorporated for claims filed with Chubb the last 6 years for the regular business purposes of approving or denying customer claims.

at 5121 Brown St Philadelphia, PA 19139.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Assata Acey (Pro Se)
5121 Brown St,
Philadelphia, PA 19139
770-231-1017

BY THE COURT:

DATE:

By

2023-01782-CT

COURT OF COMMON PLEAS OF CHESTER COUNTY—CIVIL ACTION REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS

In light of case: Assata Acey v. InductEV Incorporated, Please produce the following documents in PDF format:

- 1. Emails sent to and from Joren Wendschuh's Employee account which include my name in the body and originating within dates 04/23/2021-06/17/2022.

 Answer:
- Emails sent to and from Judy Talis' former Employee account which include my name in the body and originating within dates: 04/23/2021 - 06/17/2022.
 Answer:
- Emails sent to and from Diana Wilmes' Employee account which include my name in the body and originating within dates: 04/23/2021 - 06/17/2022.
 Answer:
- Microsoft Teams messages sent to and from Diana Wilmes' Employee account which include my name in the body and originating within dates: 04/23/2021-06/17/2022.
 Answer:
- Microsoft Teams messages sent to and from Judy Talis' Employee account which
 include my name in the body and originating within dates: 04/23/2021 06/17/2022.
 Answer:
- Microsoft Teams messages sent between myself and Maria Tabbut and originating within dates: 09/01/2021 - 11/20/2021.
 Answer:
- Microsoft Teams and Microsoft Meeting records (invites or calendar views showing time, title and participants is fine) between Joren Wendschuh and Judy Talis and originating within dates: 01/17/2022 - 06/17/2022.
 Answer:

- 8. Copies of all preexisting documents and statements gathered by InductEV Incorporated pursuant to our dispute.
 Answer:
- Copies of all notes and presentations used by Judy Talis regarding InductEV Incorporated's general employee diversity training.
 Answer:
- 10. Copies of all notes and presentations used by InductEV Incorporated's designated agents in the most recent general employee diversity training.
 Answer:
- 11. Claims documents submitted by InductEV Incorporated for Chubb's regular business purpose of approving or denying defendant's liability insurance claim relating to my charges against defendant.

 Answer:
- 12. Customer claims history for InductEV Incorporated for claims filed with Ace American Insurance Company (a.k.a Chubb) in the last 6 years as a part of Chubb's regular business purposes of approving or denying customer claims.

 Answer:

**Please note inclusion of my name, re: items 1-5, is construed to include non-caps sensitive variations such as: "Assata"; "Assatta"; "acey"; "Assatta".

Sincerely,

Assata Acey (Pro Se)

5121 Brown St

Philadelphia, PA 19139

03/28/2023